June 10, 2022

Ms. Charlotte B. Theobald
New York State Department of Environmental Conservation
Division of Environmental Remediation
6274 East Avon-Lima Road
Avon, New York 14414

RE: Pilot Investigation Notice
CooperVision, Inc. Facility
711 North Road
Village of Scottsville, New York 14546
NYSDEC Site No. V00175

Dear Ms. Theobald,

LaBella Associates, D.P.C. ("LaBella") is submitting this Notice for a planned Pilot Investigation on behalf of CooperVision, Inc., scheduled to occur at 711 North Road, in the Village of Scottsville, Monroe County, New York; hereinafter referred to as the "Site". This letter has been prepared to notify the NYSDEC of the project objectives and methods and to satisfy the requirements of the Site's existing Site Management Plan (SMP).

PROJECT BACKGROUND

LaBella is currently providing environmental engineering and consulting services related to the Site. To further the efforts and scope of the drafting of a full-scale thermal remediation design that is presently occurring (see also, LaBella letter titled "Remedial Action Planning and Design" dated June 9, 2022), it has been proposed that this pilot investigation occur to better delineate the western portion of the VOC plume beneath the existing building, and to refine proposed drilling methodology and project cost estimates, for possible future remediation activities.

SCOPE OF INVESTIGATION

Field Activities

Prior to initiating any subsurface / drilling activities, a *UDig NY* stakeout will be conducted at the Site to locate subsurface utilities. Furthermore, a review of utility drawings and other information regarding underground utilities in the subject area that has been provided to LaBella has occurred.

Based on current existing site conditions, available space, and to achieve the goals of supplementing the thermal remediation design, one (1) angled boring installed via sonic drilling shall be advanced in the area immediately south of the employee entrance (southwest of the cafeteria). The boring will be advanced at an angle of 50 degrees from vertical to the west and extend to a terminal depth of twenty-six (26) feet below existing ground surface (total length of boring approximately forty (40) feet). Refer to the attached Figure Y-1 depicting the boring entry point and area of investigation.

Soils from the boring will be continuously assessed by a LaBella Geologist / Environmental Scientist for visible or olfactory indications of impairment, and/or indication of detectable volatile organic compounds (VOCs) with a photoionization detector (PID).

Soil samples will be retained and submitted for laboratory analysis at a rate and frequency necessary

to better delineate the VOC plume. LaBella estimates up to five (5) soil samples and up to two (2) groundwater samples be collected for this purpose. Soil and groundwater samples will be analyzed for USEPA Target Compound List (TCL) and NYSDEC Commissioner's Policy (CP)-51 List VOCs using USEPA Method 8260. Groundwater samples will also be submitted for analysis of 1,4-Dioxane in water by USEPA Method 8270D-SIM Modified. One (1) soil/solid composite sample for waste characterization purposes shall be collected and analyzed according to applicable USEPA and NYSDEC protocol.

Upon the completion of investigation activities, the borehole will be backfilled with grout.

All investigative activities included within this proposal shall occur in accordance with the Site Management Plan (SMP), including applicable HASP and CAMP documents.

Quality Assurance / Quality Control (QA/QC)

A Quality Assurance / Quality Control (QA/QC) sample in the form of a Trip Blank shall accompany the sample delivery group. No other QA/QC samples are planned as a part of this Pilot Investigation.

It should also be noted that at this time, a data usability summary report (DUSR) is not intended to be completed. However, the data deliverables will be sufficient such that a DUSR may be requested as a part of future assessment of Site conditions.

Investigation Derived Waste (IDW)

All soil cuttings and excess groundwater (i.e., purge water) generated during field activities will be properly containerized in 55-gallon drum(s) and treated as investigation-derived waste (IDW) requiring special characterization, handling, and disposal. Waste characterization / sampling and disposal shall occur based on the volume of IDW generated and the requirements of the SMP and selected disposal facility.

Reporting

Upon conclusion of field activities and the receipt of laboratory results, LaBella shall prepare a summary report suitable for inclusion in the annual Periodic Review Report (PRR) and for use in refining the scope and limits of the full-scale thermal remediation design. Elements of the summary report shall include:

- A summary of all field activities and observations;
- summary of analytical results (including comparison to applicable regulatory standards);
- mapping that depicts investigation location and extents; and,
- all field monitoring data (CAMP reporting).

SCHEDULE

Activities are scheduled to occur according to the following timeline:

Activity / Deliverable	Date(s)
Field Investigation Activities	Wednesday, June 22 – Friday, June 24, 2022
Receipt of Analytical Results	Early to Mid July 2022
Data Package Report Submitted	Mid to Late July 2022

CLOSING

If you have any questions, or require additional information, please do not hesitate to contact LaBella at (585) 287-9089 or CooperVision EHS, Mr. Ryan DeBarros, at (585) 358-1492.

Respectfully submitted,

LABELLA ASSOCIATES, D.P.C.

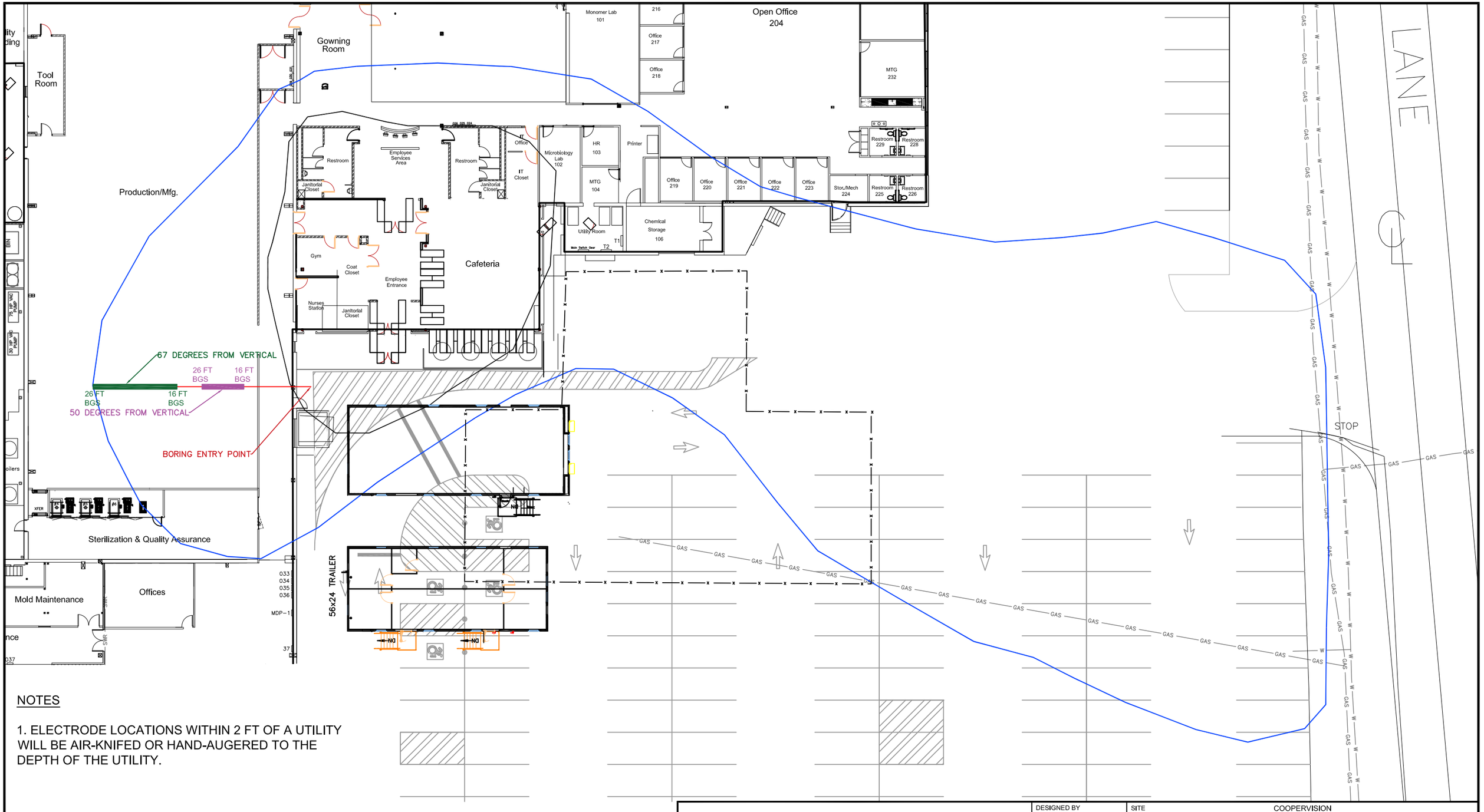
Drew Brantner
Assistant Project Manager

Daniel P. Noll, PE
Project Manager & Vice President

Attachment:

Figure Y-1 – Site Plan (with Boring Entry)

\\PROJECTS1\ProjectsAM\CooperVision\2220880 - Thermal Remediation Design\11_Reports\Notifications\Coopervision Pilot Notice.docx



NOTES

1. ELECTRODE LOCATIONS WITHIN 2 FT OF A UTILITY WILL BE AIR-KNIFED OR HAND-AUGERED TO THE DEPTH OF THE UTILITY.

LEGEND

ELECTRODE

0 15 30 60

SCALE IN FEET

TRS Accelerating Value

TRS GROUP, INC. PO BOX 737 LONGVIEW, WA 98632

DESIGNED BY	C. CROWNOVER
DRAWN BY	C. CROWNOVER
CHECKED BY	PENDING APPROVAL
PROJECT MANAGER	TRS PERSONNEL
QSAT REVIEW	QSAT PERSONNEL

SITE	COOPERVISION
LOCATION	SCOTTSVILLE, NEW YORK
CLIENT	LABELLA

SITE PLAN WITH ELECTRODE LAYOUT

APPROVED FOR CONSTRUCTION

BY _____

DATE _____

DATE 2022.MAY.02

PROJECT P2398

SHEET Y-1